



PIASA PALISADES GROUP

THREE RIVERS PROJECT

March 11, 2013

John Mooney
Air Division
U.S. EPA Region 5 (A-18J)
77 W. Jackson Blvd.
Chicago, IL 60604-3590

RE: Comments on Veolia; Docket ID No. U.S. EPA-R05-OAR-2012-0649:

Dear Mr. Mooney:

The Sierra Club understands that the U.S. Environmental Protection Agency is proposing to reopen a Clean Air Act permit for a hazardous waste combusting facility in Sauget, Illinois. We support the revised permit because it includes "feedrate" limits for certain heavy metals including mercury, arsenic and lead, and because it contains additional requirements for monitoring the waste incinerated by Veolia at the facility. We are hopeful that these steps will improve compliance by clarifying what this facility must do to control air pollution at their location.

The Sierra Club supports the monitoring EPA suggested but would like to see monitoring occur for a longer timeframe. Due to the fact feed rates change over time (week to week, month to month and year to year), one year of monitoring may not be sufficient to ensure federate limits are being adhered to.

The Sierra Club would also like to see monitoring occur on all three stacks versus just the one (Unit 3). Unit 1 and 2 are in close proximity to one another, so we suggest adding one additional monitor located near those two units as a reasonable recommendation.

We hope that the changes EPA is proposing, along with the improvements listed above, will result in lower pollution limits for specific hazardous emissions. These pollutants are known or suspected to cause serious health problems such as cancer or birth defects. In 2011, EPA published a study of risks from air toxics, showing that the national average cancer risk from air toxics is 50 in a million. In general, cancer risks for the Metro East are similar to the national average, but there are some areas that are above the average and can be found in the East St. Louis area. East ST. Louis saw an unusually high arsenic concentration reading during a 2009 study, as documented in the Final Technical Report, US EPA Grant XA987912-01, *on April 13, 2009, an unusually high arsenic concentration, a two- hour average arsenic concentration of 2,345 ng/m3 was monitored from 10 AM to 12 noon at the East St. Louis site.* While one can't identify any one source for this reading, it does demonstrate the value of monitoring and reducing potential emission sources where feasible. Plus, we know that Veolia has a history of violations and needs to be closely monitored for compliance.

The EPA's mission reflects the Sierra Club's belief that our air quality needs to improve and continue to be monitored with the health of the American citizen's in mind. Therefore, the Sierra Club hopes our recommendations will be included to improve the permit for all involved parties.



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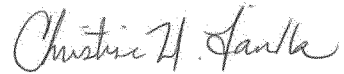
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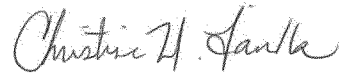
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Sincerely,

A handwritten signature in cursive script, appearing to read "Christine H. Favilla".

Christine Favilla
Three Rivers Project Coordinator
Piasa Palisades Group of the Sierra Club
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200 W 3RD Street Suite 101
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